

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	) Chapter 11
	)
W.R. GRACE & CO., <u>et al.</u> ,	) Case No. 01-1139 (JKF)
	) Jointly Administered
Debtors.	) Re: Docket Nos. 9008 and 9186

**DEBTORS' MOTION FOR LEAVE TO FILE A REPLY IN SUPPORT OF THEIR  
MOTION FOR LIMITED WAIVER OF DEL. BANKR. L.R. 3007-1 TO PERMIT  
FILING OMNIBUS OBJECTION TO 2,938 UNAUTHORIZED CLAIMS**

The Debtors hereby request authority pursuant to Del Bankr. L.R. 9006-1(d) to file a reply in further support of the Debtors' Motion for Limited Waiver of Del. Bankr. L.R. 3007-1 to Permit Filing Omnibus Objection to 2,938 Unauthorized Claims filed by the Law Firm of Speights & Runyan (Docket No. 9008) (the "Debtors' Motion"), which is currently scheduled for hearing before this Court on August 29, 2005 at 12:00 p.m.

The Speights & Runyan firm ("Speights") has signed and filed numerous claims on behalf of claimants it does not represent. The Debtors have sought a waiver of the local rules to bring the issue of all of these unauthorized claims before the Court prior to the Court having to address the merits of these claims.

On August 12, 2005, Speights filed a Response and Partial Objection to the Debtors' Motion (Docket No. 9186) (the "Response"). In its Response, Speights, among other things, now concedes that it has signed and filed claims on behalf of more than 1000 claimants without authorization, including nearly 400 claims filed on behalf of entities Speights cannot even locate. Resp. at 8. Speights also proposes a new schedule that would further delay the Debtors' emergence from Chapter 11. The Debtors seek leave to file a reply that addresses these new issues raised by Speights' Response.

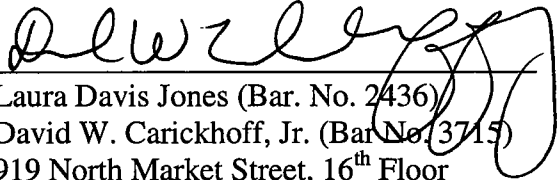
WHEREFORE, the Debtors respectfully request entry of an Order granting them authority to file the reply, which is attached hereto as Exhibit 1.

Dated: August 19, 2005

KIRKLAND & ELLIS LLP  
David M. Bernick, P.C.  
Michelle H. Browdy  
Janet S. Baer  
200 East Randolph Drive  
Chicago, Illinois 60601  
Telephone: 312/861-2000  
Facsimile: 312/861-2200

and

PACHULSKI, STANG, ZIEHL, YOUNG, JONES &  
WEINTRAUB P.C.

  
\_\_\_\_\_  
Laura Davis Jones (Bar. No. 2436)  
David W. Carickhoff, Jr. (Bar No. 3715)  
919 North Market Street, 16<sup>th</sup> Floor  
P.O. Box 8705  
Wilmington, Delaware 19899-8705 (Courier 19801)  
Telephone: 302/652-4100  
Facsimile: 302/652-4400

Co-Counsel for the Debtors and Debtors in Possession

SO ORDERED this \_\_\_\_ day  
of August, 2005

\_\_\_\_\_  
The Honorable Judith K. Fitzgerald  
United States Bankruptcy Judge